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Before the  
Federal Communications Commission  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Administration of the )  
North American Numbering Plan )

Reply Comments of the  
Association for Local Telecommunications Services  
(ALTS)

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ALTS strongly supports the overwhelming consensus of the commenters herein that there is a need for Commission inquiry into the matters raised by NARUC's Petition. Because the North American Numbering Plan (NANP) is administered through their jointly-owned subsidiary, Bellcore, and because they all face the prospect of competition in their heretofore monopoly services, the seven Regional Bell Operating Companies have both the opportunity and the incentive to influence Bellcore to their competitive advantage.

The Association for Local Telecommunications Services (ALTS) submits these reply comments pursuant to Public Notice DA 91-1307, released October 18, 1991, in response to comments filed by other parties with respect to the Petition filed by the National Association of Utility Regulatory Commissioners (NARUC), which requested a Notice of Inquiry into the administration of the North American Numbering Plan. ALTS is the non-profit national industry trade association representing over 30 companies that build and operate state-of-the-art digital fiber optic and microwave networks in over 40 U.S. cities.

Called "Competitive Access Providers" ("CAPs") by the Commission in CC Docket 91-141 (Expanded Interconnection), these

companies provide services that compete with those offered by RBOCs and other local exchange companies (LECs) as well as some services that LECs do not offer. CAPs initially build networks and gain regulatory approvals for special access and private line services (DS-0, DS-1, DS-3 and related services). Technology improvements and subsequent regulatory actions then permit CAPs to interconnect their networks with LEC networks to provide special access and switched access transport services in competition with the LECs. One large CAP is beginning to offer centrex-type switched services.

Estimated 1991 revenues for the entire CAP industry are \$150 million, compared with over \$100 billion for the LECs. The ability of CAPs to eventually provide effective competition to the LECs depends upon several modifications of the North American Numbering Plan that will encourage and foster such competition. At the very least, the NANP should not operate to their detriment. Among the issues that could arise are:

- o inclusion of new services and applications within existing numbering plans;
- o local number portability;
- o procedures for decision-making and dispute resolution by industry entities with numbering plan responsibilities;
- o retaining or partially replacing Bellcore as the NANP Administrator; and
- o administration of numbering systems in a non-discriminatory and equitable manner.

Over two dozen parties filed comments herein and a substantial number concurred that there is a need for a Commission inquiry. State commissions, interexchange carriers, paging and cellular carriers, Canadian carriers, as well as CAPs and even several LECs all support


NARUC's petition. This solidarity is unusual in Commission proceedings and demonstrates that real present and future concerns of a diverse group of highly credible and significant telecommunications industry participants exist with the current approach.

Among the many concerns are the totally different perspective that LECs and their subsidiary Bellcore have on number plans, born out of their heritage of monopoly provision of telephone services, as well as the plans' inherent bias towards traditional (monopoly landline) services, rather than new concepts such as "personal telephone numbers" and new technologies such as "personal communications services."

Because of the Commission's responsibility under the Communications Act of 1934 to promote "a rapid, efficient, Nationwide, and world-wide wire and radio communication service with adequate facilities at reasonable charges . . .", the Commission should acknowledge these many concerns of multiple parties by granting NARUC's Petition and issuing a Notice of Inquiry regarding the administration of and policies concerning the North American Numbering Plan.

Respectfully submitted,

ASSOCIATION FOR LOCAL  
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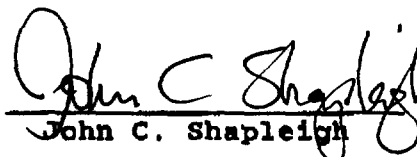
CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 1992, copies of the Association for Local Telecommunications Services Reply Comments In the Matter of Administration of the North American Numbering Plan were sent by first class mail, postage prepaid, to the following:

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